

The Republican Party of Kentucky

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**HAND DELIVERED
TO KREF**

August 22, 2008

Kentucky Registry of Election Finance
Attention: Hon. Emily Dennis/General Counsel
140 Walnut Street
Frankfort, Ky. 40601

08-22-08P01:02 RCVD

Ladies and Gentlemen:

I am writing on behalf of the Republican Party of Kentucky ("RPK" or the "Party") to request an advisory opinion from the Registry regarding several campaign finance issues.

As you know, two Republicans currently serve as statewide Constitutional officers. (These officials shall be referred to as an "Elected Official" in this letter.) Both were re-elected in 2007 and are therefore ineligible to run for re-election. Because they are term-limited, they are unable to raise and spend money for certain expenses that during their first terms would have been paid for by their campaign accounts. Neither Elected Official is a declared candidate for any office.

Both of these men are current and future leaders of the Party and are members of the RPK State Central Committee. We believe it would benefit the Party if RPK incurred certain expenses to showcase these party leaders. The expenses we wish to incur are the types of expenses that would also have been permissive candidate expenses were these individuals running for an identifiable office.

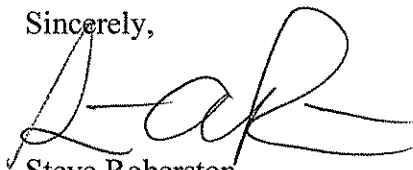
We have a couple of specific expenses that we may wish to incur. Before doing so, however, we are seeking an advisory opinion.

1. May we fund a website that promotes the Elected Official? This website will be more political than a typical government website, but will not promote the Elected Official for any elected office. Rather, the goal will be to highlight the accomplishments of the Elected Official as a state and Party leader. The website may contain some content from the Elected Official's previous campaign website, but any transfer of such content will be reported as an arms length transaction between the previous campaign account and RPK. The website will be sanitized and stripped of all references to campaign activity, such as soliciting volunteers and contributors. The domain name may be the Elected Official's name, such as www.johnsmith.com, but would not contain anything relating to a campaign, such as www.smithforgovernor.com.

2. May we pay for Christmas Cards featuring the Elected Official and the Elected Official's family?
3. May we pay for media and communications training for the Elected Official?
4. May we pay to maintain a database of constituents, past contributors and other contacts for an Elected Official that was created during the campaign that will be used by RPK and the Elected Official? Any transfer of data will be reported as an arms length transaction between the previous campaign account and RPK.

If you need any additional information to help you to answer these questions, please contact me at your earliest convenience. Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Lar" or "Larson", with a stylized flourish at the end.

Steve Roberston
Chairman
Republican Party of Kentucky